

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

NAVIENT SOLUTIONS, LLC,)	
)	
Plaintiff,)	
)	Civil Action No. 1:19-cv-00461
v.)	
)	
THE LAW OFFICES OF)	
JEFFREY LOHMAN, ET AL.,)	
)	
Defendants.)	

THE LOHMAN DEFENDANTS' NOTICE OF SUBSEQUENT AUTHORITY

Defendants the Law Offices of Jeffrey Lohman, P.C. and Jeffrey Lohman (herein collectively referred to as "The Lohman Defendants") hereby submit for the Court's consideration the decision of the U.S. Court of Appeals for the Ninth Circuit in *Pick v. Kay*, No. 20-55804, 2022 WL 193197 (9th Cir. 2022), which was decided on January 21, 2022.

DATED: February 16, 2022

Respectfully submitted,

/s/ Thomas F. Urban II
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT a true and accurate copy of the foregoing was sent using the Court's CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record for all parties who have appeared in this action on this the 16th day of February, 2022.

/s/ Thomas F. Urban II

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